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VENGROW & TEXTOR, LLP
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PL SHIPPING & LOGISTICS LTD.

Plaintiff,

v.

H.J.M. INTERNATIONAL, INC. and BANK
OF AMERICA and AFFORDABLE LUXURY
RYAN KENNY

Defendants.

ECF CASE

07 CV 2818 (SHS)

**H.J.M. INTERNATIONAL, INC'S
ANSWER TO THE CROSSCLAIM
OF BANK OF AMERICA**

Defendant H.J.M. International, Inc. (hereinafter referred to as "H.J.M.") through its attorneys Cichanowicz, Callan, Keane, Vengrow & Textor, LLP in response to Co-Defendant Bank of America's (BOA) Cross-Claim against H.J.M. answers as follows:

IN RESPONSE TO THE FIRST CROSSCLAIM

1. Denies each and every allegation contained in Paragraph 34 of BOA's Answer and H.J.M. repeats, reiterates and realleges each and every crossclaim asserted by H.J.M. against BOA in this action as set forth in H.J.M.'s pleading with the same force and effect as if herein set forth at length.

IN RESPONSE TO THE SECOND CROSSCLAIM

2. Denies each and every allegation contained in Paragraph 35 of BOA's Answer and H.J.M. repeats, reiterates and realleges each and every crossclaim asserted by H.J.M. against BOA in this action as set forth in H.J.M.'s pleading with the same force and effect as if herein set forth at length.

IN RESPONSE TO THE THIRD CROSSCLAIM

3. Denies each and every allegation contained in Paragraph 36 of BOA's Answer and H.J.M. repeats, reiterates and realleges each and every crossclaim asserted by H.J.M. against BOA in this action as set forth in H.J.M.'s pleading with the same force and effect as if herein set forth at length.

IN RESPONSE TO THE FOURTH CROSSCLAIM

4. Denies each and every allegation contained in Paragraph 37 of BOA's Answer and H.J.M. repeats, reiterates and realleges each and every crossclaim asserted by H.J.M. against BOA in this action as set forth in H.J.M.'s pleading with the same force and effect as if herein set forth at length.

IN RESPONSE TO THE FIFTH CROSSCLAIM

5. Denies each and every allegation contained in Paragraph 38 of BOA's Answer and H.J.M. repeats, reiterates and realleges each and every crossclaim asserted by H.J.M. against BOA in this action as set forth in H.J.M.'s pleading with the same force and effect as if herein set forth at length.

WHEREFORE, Defendant H.J.M. respectfully requests an Order dismissing each and every Crossclaim of Bank of America together with cost, reasonable attorney's fees, and further relief the Court may seem just and proper.

Dated: New York, New York
June 29, 2007

CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR, LLP
Attorneys for Defendant H.J.M. International, Inc.

By: / s / Patrick Michael DeCharles, II
Patrick Michael DeCharles, II (PMD/9984)
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To: Eugene J. McDonald, Esq.
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3 Gannett Drive
White Plains, New York 10604
Attorneys for Defendant Bank of America, N.A.

CERTIFICATE OF SERVICE BY ECF AND BY REGULAR U.S. MAIL

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On June 29, 2007, I served a complete copy of **Defendant H.J.M.'S Answer to Defendant Bank of America's CrossClaim** by ECF to the following attorney at his ECF registered address and by regular U.S. mail at the following address:

TO: Eugene J. McDonald, Esq.
Attorney for PL Shipping & Logistics Ltd.
170 Broad Street
Matawan, New Jersey 07747
(732) 483-8485

Constantine A. Despotakis, Es
Wilson, Elser, Moskowitz, Edelman & Dicker LLP
3 Garnett Drive
White Plains, New York 10604
Attorneys for Defendant Bank of America, N.A.

/s / Patrick Michael DeCharles, II
Patrick Michael DeCharles, II (PMD/9984)

DATED: June 29, 2007
New York, New York